

Witness Name: Alistair Law

Statement No.: 1

Exhibits: AL/1 – AL/38

Dated: 24 October 2024

UK COVID-19 INQUIRY

WITNESS STATEMENT OF ALISTAIR LAW

I, Alistair Law will say as follows: -

1. I am currently the Director of Public Policy and Government Affairs, UK and Ireland at TikTok Information Technologies UK Limited ("**TikTok UK**"), which provides the TikTok service to users in the UK. I am authorised on behalf of TikTok to make this witness statement in response to the 30 August 2024 letter from the UK Covid-19 Inquiry (the "**Inquiry**") requesting that TikTok UK identify an individual to provide a written witness statement in respect of certain matters detailed within that letter concerning the management of disinformation and misinformation (also referred to as "dis/misinformation") in relation to Covid-19 vaccines (the "**Rule 9 Request**").
2. As I explain in paragraph 6 below, I have been in my current role since February 2024. For this reason, while I am able to address some of the matters set out in this witness statement from my own knowledge and overall am an appropriate person to provide this statement on behalf of TikTok UK in circumstances where there is no individual employee with direct knowledge of all of the facts and matters discussed in this witness statement, my first-hand knowledge of the matters covered in this witness statement is necessarily limited. Most of the knowledge and information that I have about the matters discussed in this witness statement has instead been derived from contemporaneous documents or provided to me by others in the TikTok group. Contemporaneous documents have in particular been important because, due to the passage of time, a number of relevant employees who were in post at the relevant time have since moved on. Where the facts and matters in this witness statement are not within my own knowledge, they are true to the best of my information and belief.

3. The topics set out in Annex A of the Rule 9 Request (each of which I address in this statement) concern disinformation and misinformation in relation to Covid-19 vaccines over the period of time between 30 January 2020 (the date upon which the first cases of Covid-19 were confirmed within the UK) and 28 June 2022 (the **"Relevant Period"**). My statement is structured as follows: Part A provides background and context to my role, as well as to the presence of TikTok in the UK. Part B explains the various policies that govern the use of the TikTok platform, as well as how we define disinformation and misinformation. Part C explains the other strategies and procedures we used for monitoring and countering dis/misinformation on Covid-19 vaccines, including the way in which we worked with the Counter-Disinformation Unit (**"CDU"**). Part D addresses the key themes, sources of and motives behind Covid-19 vaccine dis/misinformation that TikTok has identified during the course of our work to detect and moderate dis/misinformation. Finally, Part E sets out the "lessons learned" by TikTok on countering dis/misinformation online, particularly regarding vaccination.
4. Where I refer to specific documents in this statement, copies of those documents are exhibited to this statement in a series of exhibits marked **'AL[X] – INQ[X]'** and identified by the Inquiry's unique reference number for that document.
5. References in this statement to "TikTok" are references to the app/platform and/or the relevant service providers/TikTok entity accordingly. TikTok contracts with its users via its Terms of Service. As explained below at paragraph 16, since 29 July 2020, for TikTok users registered in the UK, the contracting entity and service provider has been TikTok UK. References to "we" and "our" are references to TikTok UK (or the TikTok entity which was the relevant service provider or employer (as appropriate) at the time) or (where relevant, for example, where policies were introduced globally) to the TikTok platform globally.

PART A: BACKGROUND/CONTEXT

My role and professional background

6. I am TikTok's Director of Public Policy and Government Affairs for the UK and Ireland. I was appointed to this role on 5 February 2024. In this role, I lead government relations teams in the UK and Ireland, with five people reporting directly to me. My teams and I are responsible for representing TikTok's interests with political stakeholders in these markets, in order to earn trust and navigate, manage,

and mitigate political, legislative, and regulatory challenges for TikTok. This activity includes:

- A. leading direct engagement with policymakers at all levels of government;
 - B. providing strategic guidance to internal teams to allow TikTok to respond effectively to key political, legislative, and regulatory developments; and
 - C. developing relationships with industry peers, local trade organisations, relevant NGOs, and other key partners.
7. More broadly, my professional background is in public policy roles in the technology and media sector. I joined TikTok from Sky, where I spent ten years (the last four as Director of Policy) leading public policy, government relations and industry engagement in the UK across all of Sky's business areas, including representing the company on the Board and Steering Committees of a number of trade associations. Prior to that I worked for the industry regulator Ofcom from 2008 to 2013, developing policy and strategy for the communications sector.

Background to TikTok in the UK

8. TikTok is an online entertainment platform (available as an app and via a web browser) that allows users to post and share mobile video content. Users can upload content to the platform, which is then displayed to other users on their feed.
9. A user's feed is split into various sections which they can switch between. For example, there is a tab called the "For You" feed which is a personalised feed of content based on the user's interests and engagement. The "For You" feed is the default page users land on when they open the app and is where the vast majority of content on TikTok is consumed by users. For a number of years, TikTok also included a "Discover" tab which displayed content to the viewer selected by TikTok's algorithm (including trending videos, hashtags, creators and sponsored content).
10. The TikTok algorithm uses machine learning to understand a user's preferences based on how they engage with content on the platform. This includes the accounts that the user follows, the content that the user views and engages with, and the time spent on each video. The Discover tab was replaced by a "Friends" tab which features content from friends (i.e. followers of that user that the user follows back). Users can also "search" the platform by typing in what they are looking for (such as "cooking" if they are looking for videos with recipe ideas). TikTok offers different

advertising formats, including advertisements that appear in the user's feed and advertisements that are shown to users upon opening the app.

11. TikTok launched in the UK in August 2018. TikTok experienced significant user growth during the Relevant Period, reaching more than one billion global users by 27 September 2021.
12. TikTok's Trust and Safety teams lead user safety strategy, decision making and enforcement operations. TikTok's policies (explained further below) are generally set at a global level, with additional specific policies created at a local level where required, including to complement the local context and culture. During the Relevant Period, a number of new global policies were introduced or amended in response to the Covid-19 pandemic.

PART B: DIS/MISINFORMATION AND TIKTOK'S RELEVANT POLICIES

13. TikTok's current Community Guidelines define misinformation as "false or misleading content", and state that "misinformation that may cause significant harm to individuals or society, regardless of intent" is not allowed on the platform, in addition to "[h]ealth misinformation, such as misleading statements about vaccines, inaccurate medical advice that discourages people from getting appropriate medical care for a life-threatening disease, or other misinformation which may cause negative health effects on an individual's life" (AL/1 – INQ000507485).
14. Disinformation on the other hand involves an element of intentionality (for example, where false or misleading information is intentionally disseminated for the purpose of influencing someone's actions and choices). The Community Guidelines referred to above apply to content regardless of the poster's intent, as the content's harm is the same either way. Hence, they cover both "disinformation" (which is intentionally shared to mislead) and harmful misinformation that may not have been shared with the goal of deceiving people. As explained further in paragraph 19 below, the Community Guidelines are focussed around harmful misinformation. The Community Guidelines (under "Spam and Deceptive Behavior") also state that we do not allow account behaviour that may mislead our community (including conducting covert influence operations, which is described further below at paragraph 75).
15. The process of identifying, reviewing and removing harmful misinformation at TikTok is based on two pillars: policy and enforcement.

Policy development during the Relevant Period

16. TikTok's policies, which apply to everyone and everything on the platform (known as "**Community Guidelines**") define a set of norms and common code of conduct, including for what is and what is not allowed. The Community Guidelines are publicly available documents published on the app and TikTok's website (a copy of the current version is exhibited to this statement at **AL/1 – INQ000507485**). These guidelines (which are updated on an ongoing basis to address new risks and harms and bring greater transparency about our rules and how we enforce them) are incorporated into TikTok's Terms of Service and so form part of the contract between TikTok users and the local service provider (which, for UK residents, was TikTok Inc. up to 28 July 2020 and from 29 July 2020 to present is TikTok UK) (**AL/2 – INQ000507496**). Our current Terms of Service (applicable to UK users) are also exhibited to this statement (**AL/3 – INQ000507507**).
17. The Community Guidelines are specifically designed to be applied to a wide range of content to enable them to adapt to a constantly changing content environment. We regularly assess the Community Guidelines to consider how we can enable creative expression while protecting against potential harms.
18. The Community Guidelines are sub-divided into separate policies including on Integrity and Authenticity ("**I&A**"), which relates (among other things) to misinformation.
19. It is important to clarify that TikTok's I&A policies¹ are framed around "harmful misinformation", rather than making a distinction between misinformation and disinformation. From our perspective, and as foreshadowed above, the key distinction between the two terms is intent. When we enforce our I&A policies (which cover harmful misinformation), we consider whether the content in question is misinformation and, then, how harmful the content is. If we identify a harm that reaches the threshold of the I&A policies, we take action. This is partly because it is difficult to determine the intent (which is subjective) behind content while reviewing it through a misinformation lens and our teams might only be able to make this assessment once further checks are performed. For example, we may be able to identify that the user who posted the content had a wider agenda or is part of a wider

¹ TikTok's published I&A policies are divided into six sections: misinformation, civic and election integrity, edited media and AI-generated content, fake engagement, unoriginal content and spam and deceptive behaviour. The term I&A policies also covers TikTok's state-affiliated media policy.

network trying to spread a message, but this would be captured by our work on "covert influence operations" (as to which, please see paragraph 75).

20. TikTok's I&A policies are the first line of defence in combatting harmful misinformation and deceptive behaviours. We have specialist teams within the Trust and Safety department dedicated to the policy issue of I&A who continually keep the policies under review and collaborate with external partners and experts to understand whether updates are required and ensure TikTok is reflecting industry best practice.
21. TikTok anticipated issues around misinformation and started modifying its I&A policies to respond to Covid-19 before the UK went into lockdown (in March 2020) so as to further mitigate risks relating to medical claims about Covid-19. The Covid-19 pandemic thereafter continued to present various challenges and so we updated our I&A policies throughout the Relevant Period to respond to trends we had witnessed and to protect our users.
22. Initially, changes were implemented to address issues with harmful misinformation around the Covid-19 pandemic more broadly. However, as discussion of vaccines became more prevalent, further changes were implemented to ensure our policies also prohibited harmful misinformation around Covid-19 vaccines. For example, we considered that content which disseminated false or misleading claims about vaccines or which was Covid-19-related misinformation could cause harm to an individual's health or wider public safety and so fell within the definition of prohibited misinformation.
23. These updates included a comprehensive, expanded publication of the Community Guidelines on 8 January 2020, to provide greater clarity on how we define harmful or unsafe content that is not permitted on the platform (**AL/4 – INQ000507517**). This version of the Community Guidelines grouped violations into 10 distinct categories, each of which included an explanation of the rationale and several detailed bullet points to clarify what types of misbehaviour would fall into that category (**AL/5 – INQ000507518**). Under the heading of I&A, this update prohibited misinformation that could cause harm to individuals, TikTok's community or the wider public, including content meant to incite fear, hate, or prejudice, and that which may harm an individual's health or wider public safety. The August 2020 update to the Community Guidelines also prohibited misinformation related to emergencies that induces panic (**AL/6 – INQ000507519**). These updates would have captured harmful

misinformation about Covid-19 and its treatment, cures and prevention methods, misinformation likely to stoke panic and subsequently result in real world harm, and conspiracy theories, such as purported links between 5G towers and Covid-19.

24. These updates to our approach meant that content which made a medical claim about Covid-19 would need to be supported by a consensus of reputable health bodies to objectively show that the claim was true. Our independent fact-checkers (which included fact-checkers based in the UK) assisted with this process by assessing content to verify claims, which would then be added to our database of previously fact-checked claims. Equally, content which made claims about Covid-19 as a disease, relevant treatment, medicines, or vaccines that was determined to be false and harmful would be taken off the platform. Depending on the content posted and the nature of the account, we could also decide to remove the account, in addition to deleting the violative content.
25. We also prohibited advertisements which presented Covid-19 in a distasteful manner, for example by manipulating consumers' fear or anxiety or spreading harmful misinformation to push sales (as shown in our advertising policy as at September 2021 (**AL/7 – INQ000507520**)). Our current advertising policies, whilst not expressly referring to Covid-19, include a policy on misleading and false content, which states that we do not allow inaccurate, misleading, or false content that may cause significant harm to individuals or society, regardless of intent and gives the example of medical misinformation such as misleading statements about vaccines (**AL/8 – INQ000507521**).
26. While TikTok was (and remains) focussed on harmful misinformation (including, in the context of Covid-19, vaccine misinformation), balancing the protection of users (and the wider public) from harmful content with freedom of expression is at the core of TikTok's "Community Principles". This is also reflected in its policies. For this reason, and in the context of individuals wishing to share their personal concerns or lived experiences of vaccines online, by way of example "[p]eople sharing their own stories or experiences about medical treatment or procedures, or health care systems (as long as it does not contain harmful misinformation, or encourage people to ignore professional medical advice or public health authority guidance)" is allowed, as expressly stated in the current version of TikTok's Community Guidelines. Similarly, the Community Guidelines are clear that statements of

personal opinion are allowed, provided that they do not include harmful misinformation.

Enforcement

27. TikTok employs (and employed during the Relevant Period) a layered approach to misinformation detection, leveraging multiple overlapping strategies to ensure comprehensive and responsive coverage. In particular, we placed (and continue to place) considerable emphasis on proactive content moderation, which means the Trust and Safety teams work hard to detect and remove the vast majority of videos that violate our harmful misinformation policies even before they are reported to TikTok by users or third parties.

Automated review

28. TikTok's systems developed so that, throughout the Relevant Period (and continuing to the present day), upon upload to the platform, video content would go through a technology-based automated review process designed to flag certain types of content that may violate I&A policies. This happened in real time (i.e. as soon as the video content was uploaded, the automatic review process was applied). As part of this, we identified key words and hashtags associated with Covid-19 which were used in the automated review process. The list of keywords and hashtags was iterative and was supplemented by further words identified from content fact-checked and determined to be violative.
29. TikTok also uses machine learning models to review text and audio content to detect potentially harmful misinformation, such as via keyword lists and using natural language processing techniques. If a potential violation is found, the automated moderation system would either pass it on to our safety teams for further review or remove it automatically if there is a high degree of confidence that the content violates our Community Guidelines. This automated removal is applied when violations are most clear-cut (**AL/9 – INQ000507522**). This ensures that such violations can be expeditiously removed from the platform. (As for content passed on to our safety teams, see paragraphs 31 to 41 below).
30. One example of TikTok's use of automated review is through similarity matching and detection. "Hashing" technology allows TikTok to keep a record of previously confirmed violative content and identify and remove matching content to prevent repeated uploads (**AL/10 – INQ000507486**).

Human Moderation (including fact-checking)

31. While machine learning models are used to help detect potential misinformation, we also need and use trained human reviewers to understand the nuance and additional context in content. The human reviewers' role is two-fold. It comprises both the assessment of content flagged for human review by the automated review process and proactive identification and review of content that may violate the Community Guidelines, based on content trends identified by the Trust and Safety team at a given time.
32. In particular, TikTok believes human review plays an important role in the decision to take action on content, for example, where content is designed to be humorous. We recognise that there can be a fine line between balancing freedom of expression (by allowing humorous content or conversation) and harmfulness of any potential misinformation. We therefore take a nuanced approach, for example by permitting content which is clearly satirical.
33. Moderation is performed by moderators with relevant expertise in the specific market in which the user producing the content is based to ensure that moderators have the necessary language capability and market knowledge. Due to the specialism required to review and address certain types of misinformation, we also have a smaller specialist team made up of subject matter experts on misinformation, including vaccine misinformation, who have enhanced training, expertise and tools to take action on misinformation (**AL/11 – INQ000507487**). During the Covid-19 pandemic, this specialist team was based in London.
34. All moderators are (and were during the Relevant Period) given training on TikTok's misinformation policies. During the Covid-19 pandemic, in recognition of the rapidly-developing situation and significance to public health, TikTok decided to hold additional training sessions with the moderation teams (as explained in an update we published on 15 December 2020 (**AL/12 – INQ000507488**)). TikTok also provided its moderation teams with detailed policy guidance and direction when moderating on crisis related misinformation, including providing clarifications and updates as required.
35. The additional layer of human review is also used to improve TikTok's automated moderation by providing feedback to the machine learning systems, which helps to capture emerging content trends and improve TikTok's future detection capabilities. Our Product and Process team (which is also part of the Trust and Safety team) also

analyse content moderation decisions by human reviewers to understand whether there are any possibilities to catch violative content at an earlier stage (noting that the vast majority of violative content is proactively removed by TikTok before it can be reported to TikTok by users or third parties) and identify trends of violative content. The output of this review may result in new technology to automatically detect certain types of potential violations or additional targeted training sessions for moderation teams to help drive a better understanding of certain policies and nuances.

36. As noted above, TikTok's Trust and Safety team is also able to proactively identify and remove content that violates the Community Guidelines. During the Relevant Period, the Trust and Safety team did this by targeting content for which they identified specific risks of potential violations, for example by focussing on a specific keyword term (such as "covidvaccinesaredangerous") or hashtag that had been identified as being associated with high risk content. TikTok's proactive review of this content typically focussed on evolving or trending content which would be more likely to spread or change quickly. The output of this proactive review would also be fed into TikTok's review processes to ensure that violations of the Community Guidelines were captured as quickly as possible.
37. TikTok also recognises that context and fact-checking are critical to consistently and accurately enforcing our misinformation policies. In 2020, we therefore introduced fact-checking programmes in eight markets, including for content uploaded by UK users, to help verify misleading content about Covid-19 (and other topics). The designated fact-checker for the UK and Ireland is Logically. Our specialist misinformation moderation team have direct access to our fact-checking partners, who help to assess the accuracy of content. All of our fact-checking partners are accredited by the International Fact-Checking Network as verified signatories of the International Fact-Checking Network's code of principles.
38. We recognise the important contribution of fact-checkers and incorporate their input into broader content moderation efforts. In particular, once content has been assessed by the fact-checkers, they provide clear and concise feedback to the moderation teams for future use, including the rationale and source of information used to reach the decision, so our moderators can use the feedback to inform moderation decisions when they see similar trends.

39. Our misinformation Policy and Product teams (which sit within the Trust and Safety team) also work closely with our fact-checking partners (and other outside experts) to understand the types of misinformation trends occurring on other platforms. For example, during the Covid-19 pandemic, we were able to receive advance warning of emerging harmful misinformation narratives (including those related to vaccines and false cures) from our fact-checking partners which facilitated proactive responses against high-harm trends² and ensured moderation teams had up-to-date guidance.
40. One of the challenges we identified during the Covid-19 pandemic was that it would not always be possible for content to be verified or fact-checked where information related to unfolding events and details were still developing. TikTok therefore designed an "unverified content" label which is applied to content which is being fact-checked or cannot be substantiated through fact-checking to encourage users to consider the reliability or source of the content. The application of the label also results in the content being ineligible for recommendation on a user's "For You" feed to limit the spread of potential misinformation. This is a material restriction, given that (as explained above) the "For You" feed is where the majority of content on TikTok is consumed by users.
41. In addition, in February 2021, TikTok introduced a new prompt feature on content which prompts users if a video had been flagged as containing unsubstantiated content. The user sees the banner on the content informing them that the content has been flagged for unverified content. If a user then tries to share the content, they are asked to pause and consider their next move before they choose to "cancel" or "share anyway". During the prompt's test phase, we observed a 24% decrease in the rate at which viewers shared flagged videos and "likes" also decreased by 7% (AL/13 – INQ000507489).

Reporting

42. TikTok also moderates content based on reports received from users through the in-app reporting feature. The feature gives users a list of reasons why they think something might violate the Community Guidelines, which (from January 2020 onwards) included "misleading information". From April 2020, a subcategory was introduced to capture "Covid-19 misinformation" as the reason for the report.

² High-harm trends included, for example, the suggestion that Covid-19 vaccinations would give vaccinated individuals AIDS or that Covid-19 vaccinations contained snake venom.

Reports are moderated against the Community Guidelines, and if a violation is found the content is removed.

43. TikTok's fact-checking partners can also report potential harmful misinformation to TikTok directly. During the Relevant Period, fact-checkers proactively reported misinformation on the platform from time to time.

Co-operation with other organisations

44. TikTok is a proactive and engaged signatory to the 2022 EU Code of Practice on Disinformation (the "**Code**"), participating in the negotiation to implementation stages of the updated Code, having previously been a signatory to the original 2018 Code of Practice on Disinformation. The Code is targeted at activities within member states in the European Union and therefore applied to TikTok's practices in the UK up until 31 December 2020 (the end of the Brexit transition period). In any case, as explained above at paragraph 12, TikTok generally sets its policies at a global level and so reflects the Code in its practices in the UK. As part of TikTok's commitments to the Code, we publish a transparency report every six months to provide granular data for activity within EU/EEA countries about our efforts to combat online misinformation. The first of these reports covered the period 16 June 2022 to 16 December 2022 (**AL/14 – INQ000507490**). Prior to these more granular reports, we prepared shorter reports which the European Commission published on its website. The first report, dated 15 July 2020 and published in August 2020, covered both the UK and our European markets. It addressed our work in providing our users with information from authoritative sources, directing users towards accurate information, and our work to prevent the spread of misinformation (**AL/15 – INQ000507491**). I have also exhibited the five other reports submitted to the European Commission for August to December 2020 (i.e. up to the end of the Brexit transition period). These reports detailed our work in fighting Covid-19 misinformation and focused on our major European markets, including Germany, France Italy, and Spain (**AL/16 – INQ000507492, AL/17 – INQ000507493, AL/18 – INQ000507494, AL/19 – INQ000507495, AL/20 – INQ000507497**).
45. As explained further below at paragraph 77, we also exchanged information on cross-platform covert influence operations as a participant in the Permanent Taskforce and subgroups set up under the Code.
46. In addition, as explained further below, we joined the Industry Group on Covid-19 and Anti-vaccination Mis/disinformation (formed in August 2021) (the "**DCMS**

Industry Group"). This involved meetings every six weeks chaired by officials from the Department for Digital, Culture, Media and Sport ("**DCMS**") and attended by representatives from Facebook, YouTube, Snapchat, Twitter and TikTok to facilitate enhanced information-sharing on Covid-19 and anti-vaccination dis/misinformation.

47. To the best of my knowledge, TikTok did not otherwise directly connect with its competitors during the Covid-19 pandemic in respect of its criteria for identifying, and its definition of, misinformation in respect of Covid-19 vaccines. TikTok did however follow public reporting from or related to its competitors to ensure that we kept up to date with the best practices in the industry.

PART C: OTHER STRATEGIES AND PROCEDURES FOR MONITORING AND COUNTERING DIS/MISINFORMATION ON COVID-19 VACCINES

48. In addition to our work developing our policies and moderation of content described above, we recognised at the start of the pandemic that our community would have numerous questions about Covid-19. We took action to provide our community with reliable information to try and counter the spread of harmful misinformation. Throughout the Relevant Period, we launched several campaigns and projects aimed at increasing media literacy in general, as well as other strategies targeted specially at dis/misinformation about Covid-19 vaccines. I have explained these various projects below in more detail.

Providing access to trusted information

49. In January 2020, we introduced in-app public safety announcements ("**PSAs**") that provided users with easily-accessible links to information from the World Health Organisation and, for the UK, the British Red Cross when they searched for hashtags related to the Covid-19 pandemic (**AL/12 – INQ000507488**). #Covid, #coronavirus and #covid19 are examples of such hashtags. As vaccines came more into focus, hashtags such as #covidvacineeeffects and #covidvaccine would also trigger the PSAs. The Transparency Report we published on 24 February 2021 which covered the period 1 July 2020 to 31 December 2020 highlighted that the PSAs on hashtags directing users to the World Health Organisation and other local public health resources (such as the British Red Cross) had been viewed over 38 billion times (**AL/21 – INQ000507498**). In addition, we imposed restrictions on the visibility of specific search terms that credible authorities like the World Health Organisation had discredited as misinformation. We emphasised to our users that our guidelines strictly prohibited any misinformation intended to deceive or mislead

the public and that we remove misinformation that could cause harm to an individual's health or wider public safety (**AL/22 – INQ000507499**). In practice, this meant that if a user searched for a discredited term, they should have encountered no results and instead would have seen a message indicating that the phrase could be linked to behaviour or content that breached TikTok guidelines (see, for example, (**AL/23 – INQ000507500**)).

50. In February 2020, we launched an information hub within the platform to provide the TikTok community with easy access to accurate information about the Covid-19 pandemic (a picture of the information hub is shown at **AL/24 – INQ000507501**). As debate and discussion about the Covid-19 vaccine increased, on 15 December 2020 we announced that we were updating this hub to direct users to trusted information about Covid-19 vaccines and that this update would begin to roll out globally from 17 December 2020 (**AL/12 – INQ000507488**). Users who searched for vaccine information or tagged videos with Covid-19 and vaccines, or used "stickers"³ associated with the same, were directed to the information hub (**AL/22 – INQ000507499**). As we reported on 15 December 2020 on our website, the information hub had been viewed more than 2 billion times globally since June 2020 (**AL/12 – INQ000507488**).
51. Expanding on the PSAs, we also introduced an in-app Covid-19 video notice tag. This feature was designed to identify and tag any video that included not just hashtags but also words or audio associated with Covid-19. Once tagged, a warning banner with the words "Learn the facts about Covid-19" would be displayed to any users viewing that content (**AL/15 – INQ000507491**). This banner directed users to verifiable, trusted sources of information from organisations such as the World Health Organisation and our own in-app information hub. From January 2020 to July 2020, this banner was applied to 7 million videos across Europe and the UK (**AL/24 – INQ000507501**). The UK was the country in this region with the most videos tagged with the banner (700,000 videos). In the second half of 2020 (1 July 2020 to 31 December 2020), we added banners to over 3 million videos globally (**AL/21 – INQ000507498**). As the year progressed, we further refined this feature to address the introduction of the Covid-19 vaccine. By the end of 2020, we had introduced a variant of this feature that detected and tagged any videos containing words,

³ Stickers are a set of graphics, such as emojis, animated phrases or action buttons that users can add to their videos to increase engagement. Users can select from a range of pre-made stickers within the TikTok platform or upload their own custom designs.

hashtags or audio related to the Covid-19 vaccine. The banner for these videos read "Learn more about Covid-19 vaccines", providing users with an opportunity to educate themselves about the vaccine from trusted sources (**AL/12 – INQ000507488**). Additionally, we organised a series of livestreams led by experts from the World Health Organisation, where they shared protective measures and answered live questions from our users. These videos garnered over 33 million views in the UK (**AL/15 – INQ000507491**).

52. As noted in paragraph 42 above, in April 2020, we introduced a dedicated "Covid-19 misinformation" reporting option in-app to make it easier for users to report content. Users could press a "report" button on a piece of content, select the "misleading information" category, and then specifically report the content as "Covid-19 misinformation".
53. As explained above at paragraph 41, we introduced a new prompt in February 2021 to encourage users to pause and decide whether to share content which had been flagged as unsubstantiated/unverified content.

Media literacy: #FactCheckYourFeed campaign

54. On 18 June 2020, we launched #LearnOnTikTok in Europe (including the UK) (**AL/25 – INQ000507502**). We launched this long-term programme to bolster a trend that was already occurring on TikTok: people using the platform to learn something new, to acquire a new skill, or to get inspired to do something that they have not done before. The purpose was to increase the educational content on the platform. To achieve this, we partnered with educators, experts, real-world skill creators and non-profits who produced informative videos in the platform's short-form content format. This included, for example, a clinical psychologist producing content focussed on alleviating stress and anxiety (**AL/25 – INQ000507502**) as well as a general surgeon in the NHS who produced videos on topics ranging from health conditions to working in the NHS including vaccination strategy (**AL/26 – INQ000507503**) and, as part of #FactCheckYourFeed (explained below), explaining how vaccine misinformation spreads (**AL/27 – INQ000507504**).
55. As part of the broader #LearnOnTikTok programme, we launched our #FactCheckYourFeed campaign in May 2021 (**AL/28 – INQ000507505**). The primary objective of this campaign was to equip the TikTok community with the necessary skills to critically engage with content on the platform so that they can identify when they are being given potentially inaccurate or harmful information. The

campaign involved a collaboration with several creators to produce videos on the platform. We took the view that collaborating with creators was an effective way to create content that would reach and resonate with our target audiences.

56. We collaborated with both Government and NGOs and sought their assistance in identifying topics. Following that, we collaborated with different partners such as Beatfrees (an insight and strategy agency) to craft the appropriate messages and tips that would assist users in engaging with complex information. We then identified subject matter expert creators on TikTok and worked with them to design creative concepts that would effectively communicate such messages. Finally, we used our platform to launch a "media literacy hub" to house the content. This was a dedicated in-app space which hosted videos and guidance for users to recognise and combat misinformation online. We suggested content to users via notifications to raise awareness of the campaign and implemented search interventions (which are content suggestions given to users when they are searching relevant terms or hashtags) to direct more users to our videos.
57. We structured the #FactCheckYourFeed campaign in five phases, each delivered at two-week intervals starting from 3 May 2021. These phases focussed on media and news literacy, vaccine misinformation, financial literacy, diet and exercise literacy, and "Us versus Them" narratives.
58. We launched Phase 2 of the campaign in late May 2021 which focussed on vaccine misinformation. In collaboration with DCMS, we developed four videos featuring two NHS doctors who are also leading medical creators on the platform, using key messaging from DCMS's pre-existing "Check Before You Share Toolkit". DCMS had already launched this toolkit, which was designed to tackle the spread of false information about the Covid-19 vaccine, which included tips on how to critically analyse sources, spot false information and how to stop it from spreading. This content was hosted under the vaccine misinformation awareness tab of the media literacy hub (mentioned above at paragraph 56) and starting from 17 May 2021, we displayed a banner on the (then) Discover tab of the platform, which linked to the vaccine misinformation tab of the media literacy hub. We also directed users to the vaccine misinformation tab through "learn more about Covid" content popups (which displayed additional information or a specific message when a user interacted with a particular piece of content such as vaccine-related content) and keyword search interventions, which helped to manage and guide the information that users saw

when they searched for specific keywords or phrases. For instance, if a user searched for a term related to the vaccines, TikTok would display a prompt directing the user to one of our four videos promoting awareness of vaccine misinformation. Our #FactCheckYourFeed campaign was highly successful, garnering over 14.5 million views (as at 24 September 2021).

Team Halo

59. In October 2020, TikTok launched a collaboration with the United Nations and the Vaccine Confidence Project, known as Team Halo (**AL/29 – INQ000507506**). This initiative involved over 40 doctors and researchers, from several countries, including the UK, creating content on our platform. We designed this initiative to provide a platform for doctors and researchers to share their educational stories across TikTok and respond to questions from the public. These topics ranged from the processes involved in developing a vaccine to the methods used to test their safety, all with the aim of keeping our users informed.
60. We hosted the Team Halo videos on the "For You" feed of our users. The collaboration was successful, with numerous videos created under the hashtag #TeamHalo. For example, one member of Team Halo was Dr Anna Blakney from Imperial College London. As part of her engagement with Team Halo, Dr Blakney held a live Q&A session with the Mayor of London, Sadiq Khan (**AL/30 – INQ000507508**).
61. In response to the expanded eligibility for vaccinations and a request from the UK Government, we organised a livestreamed Q&A session on vaccine boosters with a Team Halo medical creator on 5 February 2022. During the livestreamed video, the creator discussed questions about the vaccine that were commonly raised by our users or were the subject of misinformation on our platform.

Specific support for Covid-19 vaccine-related videos and livestreams

62. In 2021, to mark World Immunisation Week (24 April to 30 April), we launched several campaigns aimed at enhancing understanding about the Covid-19 vaccine (**AL/31 – INQ000507509**). We asked the TikTok community to share their reasons for getting vaccinated in creative ways and to use the hashtag #VaccinatedFor to inspire others to get their Covid-19 vaccine too (**AL/31 – INQ000507509**).
63. In addition to the #VaccinatedFor campaign, TikTok collaborated with the director of the department for Immunisation, Vaccines and Biologicals of the World Health

Organisation, and ran a livestreamed video session titled "WHO, Live" during World Immunisation Week. This session explained how the vaccines work, why they are safe and included a Q&A session for users on our platform (**AL/31 – INQ000507509**).

64. Our last campaign involved working with a news organisation called NowThis, where we launched a five-part series called "VIRAL" and released the first video in the series during World Immunisation Week. The aim of the series was to help people get the right information regarding the vaccine and to ease concerns around getting vaccinated. It was led by a researcher specialising in infectious diseases and featured health experts from Team Halo. These experts responded to questions about the pandemic in a live Q&A session (**AL/31 – INQ000507509**).

#GrabAJab Campaign

65. In addition to our efforts on increasing media literacy, we ran a campaign on TikTok known as #GrabAJab from October 2021 (**AL/32 – INQ000507510**). This was an extension of the "Grab a Jab" challenge initiated by the NHS, which took place in the summer of 2021 and was aimed at encouraging young people to take advantage of walk-in services to boost the uptake of Covid-19 vaccinations. This was done to encourage our users to get vaccinated and to educate them on the importance of and science behind the Covid-19 vaccine.
66. As a part of this campaign, we collaborated with medical creators to organise a creator event at the Westfield Stratford vaccination centre (**AL/32 – INQ000507510**). The event provided an opportunity for attendees to receive their vaccination and meet two medical creators to discuss the vaccine. We promoted the event in advance using the hashtag #GrabAJab to encourage users to attend the event and get vaccinated. We also gave our users the opportunity to add the "I've had my Covid Vaccine" stickers to their content. Attendees had the opportunity to speak with our creators and NHS professionals about the vaccine, addressing any concerns they might have had, such as potential side effects.
67. We hosted a livestream event for those who were unable to attend or receive their vaccination on the day of the event. This involved two of our medical creators, Dr Karan Rangarajan and Dr Emeka Okorochoa, discussing the benefits of getting vaccinated, answering questions from the community, and addressing concerns related to the Covid-19 vaccine. We structured the livestream event with the creators co-hosting from different areas of the Westfield Stratford vaccination centre. One

medical creator hosted from the entrance of the centre, while the other co-hosted from the exit. We designed this setup to allow users to visually follow the vaccination journey of members of the public from start to finish.

68. Again, our livestream event was aimed at educating users on the science behind vaccination. We addressed several misconceptions concerning the Covid-19 vaccine during the event and creators had the opportunity to answer questions submitted by viewers. The creators would likely have discussed topics such as whether the Covid-19 vaccine could cause Covid-19, whether it affected fertility, whether it could alter someone's DNA, and whether young, healthy individuals needed the vaccine, as these were the types of questions being submitted by members of the TikTok community at the time.

TikTok's working relationship with the CDU

69. In addition to TikTok's various misinformation, media literacy and trusted source initiatives, we developed an active working relationship with the CDU in relation to Covid-19 misinformation during the Relevant Period.
70. The CDU was first set up within DCMS and its role was to respond to periods of acute misinformation risk, particularly content that targeted UK audiences and posed a risk to public health, public safety, or national security.
71. During the Relevant Period, TikTok engaged with the CDU across three different streams:
- A. **DCMS Industry Group:** as explained in paragraph 46 above, TikTok joined the DCMS Industry Group formed in August 2021, which involved meetings every six weeks chaired by CDU officials and attended by various other officials from the CDU and wider DCMS, the Department of Health and Social Care ("**DHSC**") and the Cabinet Office's Rapid Response Unit ("**RRU**")⁴ (another team which tracked trends in media and social media coverage), as well as representatives from TikTok, Facebook, YouTube, Snapchat and Twitter. The DCMS Industry Group discussed topics including trends and themes observed in Covid-19/vaccination misinformation.

⁴ To the best of my knowledge, TikTok's working relationship with the RRU was limited to attending DCMS Industry Group meetings at which RRU representatives were also present.

- B. **Bilateral TikTok/CDU meetings:** in addition to the DCMS Industry Group meetings, TikTok would attend bilateral meetings with CDU and DCMS officials to discuss similar issues in more detail, as well as some of TikTok's initiatives relating to Covid-19/vaccine misinformation described above.
 - C. **DCMS content escalations:** finally, the CDU would from time to time raise specific instances of potential Covid-19/vaccine misinformation it had identified on the platform with TikTok's Government Relations team. We understood that while monitoring for such content was not the CDU's primary purpose, they would occasionally raise such content with us as they came across it in the course of their work. When we received such an escalation, we would ask the relevant teams within Trust and Safety to conduct our own independent review (supported by independent fact-checker partners, as described above), in line with TikTok's Community Guidelines, and we would then update the CDU on the outcome.
72. TikTok also worked with other Government officials and supported other Government initiatives relating to Covid-19 vaccine misinformation during the Relevant Period. For example:
- A. As explained in paragraph 58 above, we collaborated with DCMS on developing videos featuring NHS doctors (who were leading creators on the platform) as part of the vaccine misinformation phase of our media literacy hub.
 - B. TikTok also supported various Government campaigns intended to counter Covid-19/vaccine misinformation and to promote public interest messaging regarding the pandemic, through our ad credits programme (which provides free advertising on the platform).⁵ This included: (1) the government's "Don't Feed the Beast" public information campaign, which was intended to tackle Covid-19 misinformation by encouraging people to question what they read online, (2) the DHSC's "Stay at Home" campaign encouraging users to stay at home, and (3) messaging from the DHSC, featured in "Top View" slots on a few occasions during the Relevant Period, which meant that, for the first five times a user opened the app, they would see

⁵ Whilst TikTok's policy is to prohibit political advertising on the platform, we do allow cause-based advertising and public services advertising from government agencies, non-profits and other entities if they are not driven by partisan political motives.

authoritative information on Covid-19 from the NHS, before seeing any other content on the platform (AL/33 – INQ000507511).⁶

PART D: KEY THEMES, SOURCES AND MOTIVES BEHIND COVID-19 VACCINE DIS/MISINFORMATION

73. As explained above (see paragraph 39), TikTok received advance warning of emerging misinformation narratives from our fact-checking partners. We found that, whereas initial misinformation centred around claims that Covid-19 was a hoax, a Government conspiracy or caused by unrelated issues such as 5G deployment, from around the announcement of the development of the Pfizer-BioNTech Covid-19 Vaccine, TikTok began to see three main themes: misleading content about the ingredients in the Covid-19 vaccines; misleading content which suggests alternative cures exist; and misleading claims concerning the safety and efficacy of the Covid-19 vaccine.
74. As explained above (see paragraph 19), TikTok's I&A policies are framed around "harmful misinformation", which focuses on information which is likely to mislead, regardless of the intention behind the content. As such, we do not have specific analysis to provide on the motives behind Covid-19 vaccine misinformation, however we were alive to the risk of misinformation and sought to introduce resources such as the information hub to minimise its risk (as described above).
75. That said, TikTok's policies do not allow coordinated attempts to influence or sway public opinion while also misleading individuals, TikTok's community, or TikTok's systems about an account's identity, approximate location, relationships, popularity, or purpose. Such attempts were (and are still) known internally as covert influence operations.
76. During the Relevant Period, we developed our approach to detecting and taking enforcement action against covert influence networks (regardless of whether the subject matter related to Covid-19 or not). We worked with industry-leading threat detection platforms to identify networks and suspicious activity and remain vigilant to such threats. We also set up specifically trained teams that were (and are still) focussed on investigating and detecting covert influence operations on TikTok. When we investigated and removed these operations, we focussed on behaviour

⁶ As an example of the campaigns mentioned in this paragraph, I exhibit a screenshot from the "Stay at Home" campaign which ran on the platform from January 2021.

and assessing linkages between accounts and techniques to determine if actors were engaging in a coordinated effort to mislead TikTok's systems or our community.

77. From Q3 2022, we published our findings on covert influence operations through our Community Guidelines Enforcement Reports. TikTok also collaborated with industry and other partners as a participant in the Permanent Taskforce⁷ and subgroups set up under the Code (as outlined above at paragraph 44, TikTok has been a signatory to the Code since 2018), including in respect of exchanging information on cross-platform covert influence operations.
78. Despite the steps outlined above, in the Relevant Period TikTok did not see on our platform any evidence of covert influence operations which had its dominant theme as Covid-19 misinformation and which specifically targeted the UK. We had also not observed coordinated attempts to influence or sway public opinion on the Covid-19 pandemic while also misleading individuals, our community, or our systems about an account's identity, approximate location, relationships, popularity, or purpose specifically targeted at the UK. We disclosed all new covert influence network takedowns in our transparency reporting where we reported on every new network discovery from Q3 2022 onwards and Covid-19 was never identified as a dominant theme for any covert influence network in the UK.

PART E: LESSONS LEARNED

79. The outbreak of the Covid-19 pandemic presented a rapidly evolving and challenging misinformation environment, which arose at a time when TikTok was still reasonably new and growing rapidly.
80. Despite the circumstances, TikTok sought to take decisive action early on, amending its existing I&A policies even before the UK went into lockdown and subsequently introducing a range of new misinformation, media literacy and trusted source interventions and initiatives to counter Covid-19/vaccine misinformation, as described above. We are proud of this response to the Covid-19 pandemic and believe that these interventions and initiatives, together with our Community Guidelines, helped to educate TikTok users and provide access to authoritative information during a challenging period.

⁷ The Permanent Taskforce is comprised of representatives of signatories to the Code (which includes TikTok), the European Regulators' Group for Audiovisual Media Services, the European Digital Media Observatory and the European External Action Service, and is chaired by the European Commission.

81. That said, TikTok recognises that misinformation was (during the pandemic) and remains a challenging issue, and it is necessary to continue investing in TikTok's ability to respond to emerging and evolving threats. TikTok therefore keeps its Community Guidelines under review and continues to focus on and invest in countering online misinformation. For example, in January 2024 TikTok shared its plan to invest more than US\$2 billion in our Trust and Safety efforts this year, including in relation to election integrity (**AL/34 – INQ000507512**).
82. TikTok has also used what it learned during the pandemic from the process of combatting Covid-19/vaccine misinformation to deal proactively with other more recent challenges. To that end, since the pandemic, we have retained the amendments made to our Community Guidelines relating to medical misinformation, as well as certain interventions introduced on the platform during that time, such as the prompt feature described in paragraph 41 above, which encourages users sharing unverified content to pause before they "cancel" or "share anyway".
83. We have also applied successful Covid-19 initiatives to counter other misinformation challenges. For example, in April 2024, TikTok introduced an in-app page hosting authoritative content about the MMR vaccine, encouraging users to get vaccinated amid rising measles cases in the UK. Modelled on the previous Covid-19 #GrabAJab campaign and using the same hashtag, the MMR page hosted content from medical creators as well as links to NHS resources (**AL/35 – INQ000507513**). We have also introduced a PSA providing links to information from local health authorities to users who look up search terms related to Mpox (similar to the PSAs introduced during the Covid-19 pandemic, referred to in paragraph 49 above) (**AL/36 – INQ000507514**). In addition, we introduced a similar search intervention for the UK General Election in 2024 as that referred to in paragraphs 56 and 58 above, which directed users to a General Election Centre on the platform, which provided reliable and authoritative information, including media literacy tips (provided in partnership with Logically) alongside key election and voting information (from the Electoral Commission) (**AL/37 – INQ000507515**).
84. TikTok also continues to invest in new initiatives to combat misinformation more broadly. For example, in late September 2024, we launched an initiative in partnership with the World Health Organisation to create reliable mental health content and combat misinformation through the Fides network, a diverse community of trusted healthcare professionals and content creators. Through this partnership,

Fides network creators in the United Kingdom, United States, France, Japan, Korea, Indonesia, Mexico, and Brazil will join TikTok to create and promote evidence-based content across various health-related topics. To further equip creators, TikTok will be working closely with the World Health Organisation to provide access to creator training programmes and resources (**AL/38 – INQ000507516**).

85. We would encourage the Government to continue its engagement with industry as we work collectively to tackle the important area of dis/misinformation, and to that end, TikTok will continue to work together with the National Security Online Information Team (the CDU's successor) as it seeks to identify potential misinformation threats. TikTok remains keen to support any other efforts to keep users safe and to help promote factual information to its community.

Statement of Truth

I believe that the facts stated in this witness statement are true. I understand that proceedings may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief of its truth.

Signed:  _____

Dated: 24 October 2024

Witness Name: Alistair Law

Statement No.: 1

Exhibits: AL/1 – AL/38

Dated: 24 October 2024

UK COVID-19 INQUIRY

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